

Exhibit 2

Brian J. Beck

From: Kaltsas, Chris (USACAN) <Chris.Kaltsas2@usdoj.gov>
Sent: Tuesday, July 21, 2020 4:43 PM
To: Brian J. Beck
Cc: Manny Medrano
Subject: RE: U.S. v. One Parcel of Real Estate Property, No. 3:20-cv-2013

Hi Brian,

I have checked the basis for the allegation, and you were correct in that the timing of the liquidation occurred earlier than 2020. I'd be happy to note that to the Court, but I have a few questions. (1) How would you propose I bring this to the Court's attention? At this point, the case is stayed unless you file a motion for reconsideration or something like that. I suppose we could also stipulate to that fact, but unless there's some mechanism to undo the stay, I'm not sure how this would affect things. (2) Do you think that this would change the Court's mind? As I stated during our phone call, the basis for what I stated in the complaint was that I had learned, in 2020, that this was occurring. The Order also does not have any reference to the date in the complaint, and was clearly decided on the merits of 18 U.S.C. 981(g) without reference to that date. It instead refers to the pending criminal prosecution and your proposed discovery requests.

Again, happy to bring this to the Court's attention in any reasonable manner you see fit. Please propose a course of action and we can go forward from there.

Chris

From: Brian J. Beck <bbeck@zuberlawler.com>
Sent: Tuesday, July 21, 2020 2:31 PM
To: Kaltsas, Chris (USACAN) <CKaltsas1@usa.doj.gov>
Cc: Manny Medrano <mmedrano@zuberlawler.com>
Subject: U.S. v. One Parcel of Real Estate Property, No. 3:20-cv-2013

Chris,

On our call last week, when I asked about the statement in your declaration in support of the government's motion to stay that around February 10, 2020, "[you] learned that claimant was liquidating his equity in various assets," you said that that date of February 10, 2020, was the date you learned of the alleged liquidation of equity, not necessarily the date the liquidation had actually occurred. You also said that you would check your records and determine the basis for that allegation, and the date on which the alleged liquidation actually occurred. Have you made any progress on finding that information?

I ask because in the Court's Order on Friday granting the government's motion to stay, the Court appears to have accepted the government's explanation that it filed the civil forfeiture action in March in response to the alleged liquidation that happened in February, and then was only delayed in seeking a criminal indictment due to the pandemic. (See Dkt. No. 52 at 4:17-21). If the Court misunderstood the timeline of events in making its decision, that timeline should be corrected and the Court should have the opportunity to reconsider its Order. Please let us know by close of business on July 23, 2020, whether our understanding of the declaration is correct and whether you are able to provide the correct timing of our client's alleged liquidation of assets that prompted the civil forfeiture complaint.

Regards,



BRIAN J. BECK

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